

UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF FLORIDA
(WEST PALM BEACH DIVISION)

FILED BY <u>ES</u>	D.C.
JUN 10 2025	
ANGELA E. NOBLE CLERK U.S. DIST. CT. S.D. OF FLA. - W.P.B.	

UNITED STATES OF AMERICA

Docket# 17-80130-CR- MIDDLEBROOKS

V.

TAVARIS JEMARIO HUNTER

MOTION TO VACATE, SET ASIDE, OR CORRECT SENTENCE
(PURSUANT TO TITLE 28 U.S.C. § 2255)

Come now TAVARIS JEMARIO HUNTER Petitioner, SUI JURIS To motion this honourable court to vacate his sentence due to the United STATES District court in the southern District of Florida violating his second Amendment by convicting petitioner of title 18 USC 922(G)(1) In support hereof, petitioner states As Follows!

(1) Petitioner argues and points out that title 18 U.S.C. § 922(G)(1) violates his second amendment and does not pass the BRUNEN MUSTER. So his sentence should be vacated and he should be released from Prison Immediately. (New York Rifle & Pistol Association vs. BRUNEN 142 S. CT 2111, L. ED. 2d 387 (2022); Range vs. Garland, NO 21-2835 (3rd Cir) United States vs Glen Prince, 2023 WL 7220127 NO 22-CR-24019 ND. FL Nov 2, 2023).

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(2) Petitioner argues and points out that 922(G)(2) imposes a far greater burden on the right to keep and bear arms than the historical categorical exclusions from the people second amendment right. The Government has not demonstrated why the modern ubiquity of gun violence and the heightened lethality of today's FIREARM technology compared to the Founding, justify a different result so petitioners sentence should be VACATED and he should be released from prison IMMEDIATELY due to title 18 U.S.C. § 922(G)(2) violating his second amendment.

(New York Rifle & PISTOL ASSOCIATION VS. BRUEN 142, S. CT 2111, 213 L. ED 387 (2022); Range Vs. Garland, No 21-2835 (3RD CIR) United States Vs. Glen Prince, 2023 WL 70220127 No-22-CR-240, 9 (N.D. ILL. NOV 2, 2023).

Therefore, Petitioner ask that this honourable court grant this motion and vacate petitioners sentence because title 18 U.S.C. § 922(G)(2) violates his second amendment.

Respectfully Submitted this day of June 5, 2025

/S/

TAUARIS JEMARIO HUNTER

116332-104

U.S.P Beaumont

P.O. Box 26030

Beaumont, TX 77726

~~CERTIFICATE OF SERVICE~~

I TAVARIS JEMARIO HUNTER, Petitioner, Do hereby certify that
I have this day caused a true and correct copy of the above
and foregoing motion to VACATE, SET ASIDE, OR CORRECT SENTENCE
(PURSUANT TO title 28 U.S.C. ' 2255)
To be delivered to the following U.S. mail Certified !!

Paul G. Rogers Federal Building and
United States Courthouse
701 Clematis Street, Room 402
West Palm Beach, FL 33401

BS/
TAVARIS JEMARIO HUNTER
16332-104
D.S.P Beaumont
P.O. Box 26030
Beaumont, Tx 77720

DATE: 6-5-2025

TAVARIS Hunter #16332-124

USP Beaumont

PO BOX 26030

Beaumont, TX 77720

INSPECTED

Paul G. Roger Federal Building
and United States Courthouse
701 Clematis Street Room 4

West Palm Beach FL 33

33401-511202